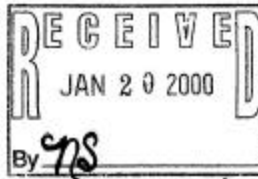




Dr. D. Clark Gibbs, Regulatory Official  
U.S. Department of Energy  
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00-RU-0184  
00-RU-B-095

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CCN #: 009182

JAN 18 2000

Dear Dr. Gibbs:

**Contract No. DE-AC06-96RL13308 – W375 – RESPONSE TO SAFETY INTEGRATION INSPECTION REPORT**

Reference: CCN 008919, Letter, D. C. Gibbs, DOE/RL, to M. J. Lawrence, BNFL Inc.,  
"Safety Integration Inspection Report, IR-99-008," 00-RU-0110,  
dated December 3, 1999.

This letter is being issued as our complete response to the referenced letter.

During the week of November 4, 1999, the Regulatory Unit conducted an inspection of the River Protection Project-Waste Treatment Plant's Safety Integration Process. The inspection team identified one Finding that comprised four examples of failure to follow procedures. These examples included: administrative aspects of the Project Safety Committee process; specifications of review criteria prior to reviewing documents; maintenance of document review and comment forms; and control of output from the Hazards Analysis teams.

This letter responds to the Finding, as well as observations and follow-up items identified in the report.

If you have any questions or if we can be of further assistance, please call Dennis Klein at 371-3743 or Don Edwards at 371-3741.

Yours sincerely,

A. J. Dobson  
Manager, Operations and Safety

DMO/jca

Attachments: 1) Response to Finding, IR-99-008-02-FIN  
2) Response to Observations and Follow-up Items

cc:

Barr, R. w/a	DOE/RL	A4-70
Brown, N. w/a	DOE/ORP	H6-60
Dobson, A. J. w/a	BNFL Inc.	A117
Edwards, D. W. w/a	BNFL Inc.	B140
Hammond, J. w/o	BNFL Inc.	B143
Landry, W. w/o	BNFL Inc.	Fairfax
Lawrence, M. J. w/o	BNFL Inc.	A110
Lehman, Karrol	BNFL Inc.	B112
Morgan, S. w/o	BNFL Inc.	A116
PDC w/a	BNFL Inc.	K110
Rasmussen, P. w/o	DOE/RL	A7-80
Smyser, L. w/a	PNNL	H6-61
Tooze, R. w/o	BNFL Inc.	Fairfax
Molnar, E. w/a	BNFL Inc.	A216
Voyles, G w/a	BNFL Inc.	B105
Younger, C w/a	BNFL Inc.	C202

**RESPONSE TO FINDING  
IR-99-008-02-FIN**

**Summary of Finding**

*During performance of an inspection of safety integration conducted November 1-4, 1999, at the Contractor's offices, the Regulatory Unit (RU) identified the following:*

- a. *Procedure K70P526A\_1, "Project Safety Committee," dated 07/99, under the Section titled "Activity," Milestone 1, stated that committee membership list and Appointment Letters were to be records and submitted to Project Document Control.*

*Contrary to the above, as of November 4, 1999, appointment letters for six of the PSC members and a list of committee members were not available in Project Document Control.*

- b. *The "Code of Practice for the Internal Review and Approval of Documents," K13C023\_2, dated 10/99, required, in Section 3.1 "Document Review Requirements", item 1, that "Review criteria shall be established before performing the review."*

*Contrary to the above, as of November 3, 1999, review criteria had not been established before performing the reviews on any of the design output documents reviewed by the inspectors.*

- c. *The "Code of Practice for the Internal Review and Approval of Documents," K13C023\_2, dated 10/99, required, in Section 6.0, "Records", that "The Preparer submits comments and comment resolution to PDC for retention."*

*Contrary to the above, as of November 3, 1999, the comments and comment resolution for drawing numbers DWG-W375PT-PR00014, Rev. 0 (Process Flow Diagram Pre-Treatment Vessel Vent System), and DWG-W375PT-PR00016, Rev. 0 (Process Flow Diagram HLW Feed Receipt and Pre-Treatment) were not in Project Document Control files.*

- d. *Procedure K70P503A\_0, "Hazard Analysis," dated 05/99, in the Section titled "Activity," for Milestones 1-5, the Standards Identification Process Database (SIPD) is considered a "Record" to be submitted to Project Document Control.*

*Contrary to the above, during the inspection, the inspectors were informed that the SIPD was not being controlled by Project Document Control.*

*The four examples of failure to follow procedures, as described above, are considered a Finding.*

**BNFL Inc. response:**

**1. Agreement or disagreement with the Finding**

BNFL Inc. agrees with the Finding; however, it should be noted the item (c) example is not entirely correct. The code of practice K13C023 referred to does not govern the review and approval of design documents, such as engineering drawings. This is stated in the Objective

subsection of K13C023 under the Scope section. The correct reference should have been K70C551; "Preparation, Checking, and Approval of Drawings and Sketches" as discussed in the body of the inspection report (page 7).

**2. Reason for the Finding**

- a. An investigation of the finding determined that the Committee Membership List could not be located within Project Document Control (PDC) and most likely had not been submitted as a record. In addition, it was determined that appointment letters for some PSC committee members could not be located on file with PDC. The letters were most likely not submitted as records either in error or because PDC did not exist at the time the appointment letters were generated and retrospective document collection was not done.
- b. The direction provided in code of practice K13C023 regarding establishment of review criteria needs to be clarified to enable personnel to follow it specifically.
- c. The direction provided in procedure K70C551 regarding document review records retention needs to be clarified.
- d. The direction provided in procedure K70P503 regarding Standards Identification Process Database (SIPD) being considered a record is the intended approach, but was not yet implemented because the database has been under continuous development to establish the appropriate scope and format. Further, establishment of SIPD as a record has been delayed until it resides in its final software form.

**3. Corrective steps that have been taken and the results achieved**

An evaluation has been performed to determine the actions necessary to bring the subject records described in items (a) through (d) up to date. The following actions are required:

- a. It has been determined that a Committee Membership List and missing appointment letters must be issued to PDC to maintain conformance with procedure K70P526.
- b. Code of practice K13C023B, Rev. 2 has been revised effective December 21, 1999 to more clearly define the minimum criteria to be applied in reviewing implementing documents and documents that specify technical or quality requirements.
- c. Code of Practice K13C023 does not govern the review and approval of design documents. The correct reference is K70C551. Procedure K70P551, Rev.0 has been revised effective January 5, 2000 to incorporate code of practice K70C551. Code of Practice K70C551 has been cancelled. The revised procedure more clearly defines the required retention for Document Review Request and Document Review Record forms. In the future, the completed forms including attachments will be retained by the originating organization in working files until the next revision of the drawing.
- d. It has been determined that SIPD should be maintained as a project record.

**4. The corrective steps that will be taken to avoid further Findings**

- a. The Project Safety Committee secretary will ensure that the List of Members is submitted to PDC and is updated in the future. In addition, necessary appointment letters will be issued

through PDC for all current members and in a timely manner as the membership changes in the future.

- b. See Item 3b above.
- c. See Item 3c above.
- d. The SIPD will be backed up on a regular basis using an appropriate medium (i.e., tape, CD, etc.) and the medium will be transferred to PDC for storage, thus establishing the SIPD as a project record:

In addition, a project-wide root cause analysis of problems associated with project procedures is being conducted by a dedicated task group to identify causes and preventive measures necessary to prevent recurrence.

**5. The date when full compliance with the applicable commitments in the authorization base will be achieved**

- a. A Committee Membership List and appointment letters will be submitted to PDC by January 31, 2000 in conformance with procedure K70P526
- b. Completed
- c. Completed
- d. The steps to be taken to establish SIPD as a project record will be completed by February 29, 2000.

The root cause analysis will be completed by January 31, 2000. There will likely be further procedural changes required from the results of the root cause analysis. Full compliance will be completed by April 24, 2000.

## **RESPONSE TO OBSERVATIONS AND FOLLOW-UP ITEMS**

### **IR-99-008-01-IFI**

*A self-identified issue was noted concerning the failure to implement an Executive Committee as required by the Integrated Safety Management Plan (ISMP).*

#### **Response:**

Although not directly as a result of this observation, an Executive Committee is being formed at the direction of the BNFL Inc. Chief Executive Officer. When configured, this committee will meet the intent of the RPP-WTP Integrated Safety Management Plan. The first meeting is intended for January 31, 2000. A determination will be made at that time whether or not the ISMP will need to be revised to reflect the established function and organization of the Executive Committee.

### **OBSERVATION**

*An example of a Finding was identified for failure to follow several administrative requirements in the Project Safety Committee (PSC) procedure.*

#### **Response:**

See our response to IR-99-008-02-FIN.

### **OBSERVATION**

*The inspectors noted that the Hazard Analysis code of practice requirement for document control of Process Hazards Analysis Records was not being implemented. Neither Hazards Analysis meeting records (and related action items) nor the Standards Identification Process Database (SIPD) were under Project Document Control as required. In addition, while the Code of Practice stated that SIPD was to be used as an action-tracking device, this was not taking place. The procedural issues discussed above were considered an example of a Finding against the Contractor's Quality Assurance Program and Implementation Plan (QAPIP) for failure to follow procedures.*

#### **Response:**

See our response to IR-99-008-02-FIN.